

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ARGOS USA LLC,

Plaintiff,

v.

CHRISTOPHER YOUNG,

Defendant.

Case No. 1:18-cv-02797-ELR

**MOTION FOR ORDER REQUIRING PRE-DISCOVERY
IDENTIFICATION OF TRADE SECRETS**

Defendant Christopher Young hereby moves the Court to order Plaintiff Argos USA LLC to identify pre-discovery the trade secrets Argos contends are at issue in this case. Young requests that the Court order Argos to identify its alleged trade secrets with specificity before Young is required to respond to Argos' broad discovery requests.

In support of this Motion, Young has filed a Memorandum of Law demonstrating that the Court should require Argos to make this basic, foundational disclosure at the outset so that: (1) Young can understand precisely what Argos contends he has done and can prepare to defend himself accordingly; (2) the Court and Young can distinguish relevant discovery from attempts to fish for competitive information; and (3) Argos cannot mold its trade-secret claims to mirror whatever information Young produces during

discovery.

For the reasons stated herein and in the accompanying Memorandum of Law, Young respectfully asks the Court to grant its Motion, order Argos to identify its alleged trade secrets as described above, and for all other just and proper relief.

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of June 2020, the foregoing Motion for Order Requiring Pre-Discovery Identification of Trade Secrets was filed electronically with the Clerk of the Court using the CM/ECF system which will send a notification of such filing to all counsel of record in this matter.

/s/ Aaron Gott

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